

Counsel at end of document

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

STIPULATION

Defendant Lucent Technologies, Inc., plaintiff Department of Fair Employment and Housing and plaintiff-intervenor Steven Caraudo, collectively referred to herein as “parties” jointly stipulate as follows:



1. This Court's Amended Case Management and Pretrial Order dated October 31, 2007 set forth a pretrial schedule including the following dates:

Disclosure of Experts (retained and non-retained): August 6, 2008; and,

Expert and Non-Expert Discovery Cutoff: September 24, 2008.

5 2. While all parties have done their best to move forward with the discovery needed to
6 prepare this case for trial, the scheduling of depositions has been difficult given the trial calendars of
7 counsel and the need to travel out of state for various corporate depositions. The parties agree that it
8 would be beneficial to have a brief extension of the above deadlines (14 additional days for expert
9 disclosure and nine additional days for discovery cutoff) in order to effectively conduct the
10 disclosure and discovery work that is needed for trial;

11 3. Therefore, the parties request that this court extend the dates for disclosure of experts,
12 and the discovery cutoff, as follows:

13	<u>Deadline</u>	<u>Proposed Extended Date</u>
14	Disclosure of Experts (retained and non-retained)	Wednesday, August 20, 2008
15	Non-expert and Expert Discovery Cutoff	Friday, October 3, 2008

17 | SO STIPULATED:

18 Dated: July 30, 2008 DEPARTMENT OF FAIR EMPLOYMENT
19 AND HOUSING

20 | **TIMOTHY M. MUSCAT**
Chief Counsel

21 SUSAN SAYLOR
22 Senior Staff Counsel

24 || By: /s/ Susan Saylor

Susan Saylor
Attorneys for plaintiff, DFEH



1 Dated: July 30, 2008

BOXER & GERSON, LLP

2

3 By: /s/ Jean K. Hyams

4

5 Jean K. Hyams
6 Counsel for Steven Caraudo

7 Dated: July 30, 2008

8 EPSTEIN BECKER & GREEN, P.C.
9 STEVEN R. BLACKBURN
10 LESLIE J. MANN

11 By: /s/ Leslie J. Mann

12 Leslie J. Mann
13 Attorney for defendant
14 LUCENT TECHNOLOGIES INC.

15 **ORDER**

16 The time for completion of disclosure of experts (retained and non-retained), and the
17 discovery cutoff (both expert and non-expert), as ordered by the court in its Amended Case
18 Management and Pretrial Order shall be extended; the new deadlines are:

19 Disclosure of Experts (retained and non-retained): August 20, 2008;

20 Expert and Non-Expert Discovery Cutoff: October 3, 2008.

21 Dated: 8/1/08



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